IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND (NORTHERN DIVISION)

ANTWERPEN CHEVROLET, LTD., et al.,

Plaintiffs,

v.

Civil Action No. CCB02CV1271

RESOLUTION PROVIDERS, INC., et al.,

Defendants.

MOTION FOR EXTENSION OF THE DATE OF ENFORCEMENT OF ORDER

COME NOW the defendant, Resolution Providers, Inc. ("RPI"), Watt, Tieder, Hoffar & Fitzgerald, L.L.P. ("WTHF") and the individual counsel of record for defendant, and pursuant to Local Rule 105.9, hereby request an extension of the date of enforcement of the Magistrate Judge's February 11, 2003 Order of further discovery and award of expenses (the "Order") and would state as follows:

- 1. On February 11, 2003 U.S. Magistrate Justice Guavey ordered RPI to submit affidavits regarding its attempts to locate requested documents and to supplement its Answers to Interrogatories by March 5, 2003. RPI, WTHF, and the individual counsel of record were also held to be joint and severally required to pay \$1,500.00 in expenses to the Plaintiffs by March 5, 2003.
- 2. Pursuant to the Order, on February 21, 2003, WTHF and the individual attorneys of record filed their Rule 37(a)(4)(A) Response to Award of Expenses ("Response"). The Magistrate's consideration of the Response remains pending.
- 3. On March 3, 2003, RPI, WTHF and the individual attorneys of record timely filed objections to the Order ("Objections"), and respectfully request that this Court

extend the date for enforcement of the obligations imposed by the Order, pending consideration of the objections.

4. Pursuant to Local Rule 105.9, the undersigned conferred with counsel for Plaintiffs regarding the extension and notified counsel of its intent to file this Motion. At the time of this filing, it is undetermined whether counsel for Plaintiffs will provide consent to the extension

Respectfully submitted this Hm day of March 2003.

J. Brian Cashmere, Esquire Federal Bar No. 14170 Kathleen Olden Barnes, Esquire Justin S. Hawkins, Esquire WATT, TIEDER, HOFFAR & FITZGERALD, L.L.P. 7929 Westpark Drive, Suite 400

McLean, VA 22102 Office: 703-749-1000

Fax: 703-893-8029

Counsel for Defendant, Resolution Providers, Inc.

Certificate of Service

I hereby certify that on Mych 4, 2003, I caused a true copy of the foregoing Motion for Extension of Date to Enforce Order to be delivered via facsimile and First Class U.S. mail to:

Price O. Gielen, Esquire Neuberger, Quinn, Gielen, Rubin & Gibber, P.A. 27th Floor One South Street Baltimore, MD 21202

Justin S. Hawkins

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND (NORTHERN DIVISION)

ANTWERPEN CHEVROLET, LTD., et al.,	;	
Plaintiffs,	: :	
v.	: Civil Action No. CCB02CV	/1271
RESOLUTION PROVIDERS, INC., et al.,	: :	
Defendants.	: :	
<u>OR</u>	<u>DER</u>	
On this day of March 2003, Re	solution Providers, Inc, Watt, Tieder, Hofffa	ar
& Fitzgerald, L.L.P., and the attorneys of re-	ecord's Motion for Extension of the Date of	of
Enforcement of Order is hereby GRANTED.		
	en e	
	CATHERINE C. BLAKE	
	United States District Court Indoe	